

Docket No. 05-015-1, Regulatory  
Analysis and Development, PPD,  
APHIS, Station 3C71, 4700 River Road  
Unit 118, Riverdale, MD 20737-1238.

Dear Friends:

The Bison Species Working Group of the USAIP/NAIS is submitting the following comments in response to the request for public comment regarding the Draft Strategic Plan and the Draft Program Standards document for the National Animal Identification System. The basic comments were formulated during a conference call meeting of the working group.

We are presenting our comments in a format that responds individually to each question posed in the May 6, 2005 Federal Register announcement. The Federal Register language is listed in *italics*, with our responses in regular typestyle.

*The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.*

A mandatory identification system is necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs. Participation and compliance in a voluntary system would be inadequate to provide an acceptable level of surveillance due to cost and inconvenience. Bison in particular would see very limited participation in a voluntary identification system that did not add value due to the difficulties encountered when handling live bison.

*In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.*

At facilities where animal commingling takes place, a manager or person in charge should be responsible for ensuring compliance. If compliance is not met, an animal should be turned away unless proper identification requirements can be met at the location. An example would be a sale barn or fair could be a tagging station to help producers to meet the identification requirements. It is critical to ensure compliance at these locations because any animal disease threat can be exponentially compounded when commingling many animals from many locations.

*In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms? Please give the reasons for your response.*

Not only is it a viable option to create tagging sites, it would be necessary to ensure compliance with the NAIS. Sale barns, vet clinics, and fair grounds are a place of concentration of animals that would not only aid a producer in meeting their tagging requirements but help ensure participation in an identification program by providing a convenient alternative to identifying animals at a location ill equipped to handle such tasks.

*The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?*

Compliance with identification and movement reporting requirements should be both the seller and buyers responsibility. If there was a choice between the seller or buyer, the responsibility should fall on the seller. This would in essence, require all animals to have been reported before shipment. Any random check of animals in transit would confirm if the reporting responsibilities had been met, providing another safeguard against noncompliance. Compliance can be achieved by data input through an AIN manager, private data provider, or a state identification system. For interstate shipment, compliance should be ensured with an electronic Certificate of Veterinary Inspection.

*USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.*

A timeframe (age limit) is not necessary to achieve timely trace back capabilities. As long as an animal remains on its premise of origin, no identification should be required. An age limit would be difficult for some bison producers because many of their animals are never handled due to animal well fare concerns and lack of handling facilities.

*Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.*

We believe the timelines for implementing the NAIS as proposed in the Draft Strategic Plan are not aggressive enough. Funding should be aggressively perused to implement the NAIS as soon as possible. Animal health is by far the most significant issue to almost all livestock producers today. Any tool available to mitigate the adverse effects of an animal health concern should have its full potential utilized as soon as fiscally possible. The bison population in the United States and Canada are at a level that is conducive to a rapid and effective implementation of an animal identification system. Other countries have surpassed the United States in animal identification and this is becoming a major trade issue that needs to be addressed now.

*Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give the reasons for your response.*

Some flexibility may be needed for the implementation of requirements for different species. This group only address' the needs of the bison industry and we feel we are prepared for an expedited implementation. However, due to the fact that some diseases are not species specific, any delay in implementing a certain species system should be avoided.

*What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herdmanagement computer system, mail, phone, third-party submission of data)? Does the type of entity (e.g., producer, market, slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.*

Currently, the most cost effective way of submitting information for the bison industry is through a herd-management system administered by the National Bison Association. The size and type of entity does make a difference in the cost and practicality of data submission. The National Bison Association allows the use of the herd management software to electronically submit information for a producer willing to spend the time and money to use the software. The least cost option is calling in the information on the phone and having the administrator submit it. Many options are currently available to meet the producer's needs and capabilities. Ultimately, the ability to allow producers to electronically submit reports is the most feasible option. There will need to be an allowance for third party submissions for producers who choose not to submit the data in the required electronic format.

*We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure, and why?*

Confidentiality is the most significant concern of bison producers. All information should be protected from disclosure. The exception is of course the outbreak of a communicable disease. In such a case, only pertinent information should be released to the necessary health officials. In any instance, the producer and location of the disease should be kept confidential unless the general public is at risk of contracting or spreading the disease.

*The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?*

To ease the burden of developing and maintaining the required records both the seller and buyer should be required to report animal movements. This coupled with as many sightings reports as possible will provide the necessary checks and balances required to ensure accurate movement records and limit the need to confirm previous animal locations.

With regards to the privately managed database addressed on page 8 of the Request for Comment, the Bison Species Working Group does not have a preferred option between a private or public database. What we would like is the most cost effective, easy to use, secure database available. At this time a comparison between the two options is not feasible. However we will address the questions posed.

*How should a private database system be funded? Please give the reasons for your response.*

A private database should be funded in such a way to minimize the cost to the producer. The driving force behind an animal identification system right now is more associated with human health and consumer safety. As this system is for the well being of our country as a whole, some amount of federal funding is necessary. As the financial burden on the producer increases, the compliance and effectiveness of the system will decrease to the point that there could be enough backlash to render the system useless.

*Should the NAIS allow for multiple privately managed databases? Please explain why or why not.*

Multiple private databases should only be considered if there is an efficient means to access all databases simultaneously and effectively. This includes species specific databases because many diseases are not species specific. There has not been a system developed to access multiple systems effectively yet. Until that time, multiple databases should not be considered.

*Should a public (government) system be made available as well as a privately managed system so that producers would have a choice? Please give the reasons for your response.*

A public system should be available in addition to a private system only if it is a cost effective and secure alternative to a private system. Giving a producer a choice is a good idea if the short comings of having multiple systems can be avoided.

*Should a privately managed system include all species? Please give the reasons for your response.*

A private system should include all species as this should be the most efficient means to collect and access data. As stated before, many diseases affect multiple species. If databases are species specific, there must be a system to easily access all databases.

*Would either system work equally well at the State level? Please explain why or why not.*

Each system should work equally well at the State level. A State system should be nothing different than a Federal system on a smaller scale. If a State chooses to offer different data collection capabilities that is fine, but the core required data has to be collected in the same manner and in the same format as a Federal system.

Thank you for considering these comments.

## USAIP/NAIS Bison Species Working Group